

US DISTRICT COURT  
WESTERN DIST ARKANSAS  
FILED

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF ARKANSAS

JAN 29 2018

DAVID A. STEBBINS

DOUGLAS F. YOUNG, Clerk  
PLAINTIFF Deputy Clerk

VS.

CASE NO. 3:17-cv-03092

STATE OF ARKANSAS, ARKANSAS  
REHABILITATION SERVICES, AND AMY JONES

DEFENDANTS

**RESPONSE IN OPPOSITION TO [131] MOTION FOR SUMMARY  
JUDGMENT AS TO REHABILITATION ACT CLAIMS**

Comes now, *pro se* Plaintiff David Stebbins, who hereby submits the following Response to Doc. 131, Defendants' Motion for Partial Summary Judgment pertaining to my Rehabilitation Act claims.

1. I find this motion, for the most part, unnecessary, since their current Motion for Summary Judgment seeks to dispose of all claims anyway. The current motion mostly re-raises arguments verbatim that were raised in that motion, so this motion does not need to exist.
2. The one new argument they raise in the current motion is that I have not alleged any wrongdoing by the State of Arkansas. This is, of course, patently frivolous. Never mind the fact that the State of Arkansas' involvement in this case should be patently obvious, the bottom line is that, if the Defendants' arguments were true, the State of Arkansas would have been dismissed as a party long ago, when the Eastern District of Arkansas was taking up their Motion to Dismiss.
3. The Defendants' Motion is frivolous and should be sanctioned.
4. To the extent that the Defendants re-raise the same issues as before, I hereby incorporate by reference my Response, Brief, and Statement of Disputed Facts in Opposition to Doc. 109, the Defendants' other Motion for Summary Judgment.
5. Wherefore, premises considered, I respectfully request that this Motion for Summary Judgment be denied, and that costs incurred be awarded for forcing me to respond to this

frivolous motion.

So requested on this, the 27<sup>th</sup> day of January, 2018.



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